

INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST

- 1 -

THE UNITED STATES OF AMERICA, et al

- VS -

ARAKI, Sadao, et al

- Defendants -

REQUEST FOR PRODUCTION OF WITNESSES AND DOCUMENTS

NOW COMES UMLZU Yoshihiro and requests the Tribunal, in accordance with Article 9(e) of the Charter, to order the production of the following witnesses and documents necessary to his defense:

I. Witnesses

1. Lieutenant General TOMINAGA Kyōji
 - (a) The nationality of the witness is Japanese;
 - (b) The present address of the witness is unknown; his affidavits introduced in this case by the prosecution show him to be a prisoner of war of the Soviet forces in Siberia;
2. Colonel ASADA Saburō
 - (a) The nationality of the witness is Japanese;
 - (b) His last official position was staff officer of the Kwantung Army, Hsingking, and his present address is prisoner of war of the Soviet forces;
3. Lieutenant General YANAGIDA Motozō
 - (a) The nationality of the witness is Japanese;
 - (b) The present address of the witness is unknown but affidavits introduced in this case by the prosecution show him to be a prisoner of war of the Soviet forces in Siberia;

- 1 -

4. Lieutenant General TANABE Moritake

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is unknown; his last official position was commanding general of the 25th Army in Sumatra. He is now believed to be a prisoner of war of the Netherlands forces in the Netherlands East Indies;

5. Lieutenant General MUTAGUCHI Ren-ya

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is unknown; his last official position was commandant of the Preparatory Military Academy in Tokyo, and after the end of the war he was transferred from Sugamo Prison to Singapore for trial as a war criminal;

6. General KAWABE Masakazu

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is Sugamo Prison;

7. ISHIKAWA Jun

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is Naritashi, Chiba-Ken;

8. Lieutenant General KASAHARA Yukio

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is Kobune, Shimonakamura, Ashigarashimogun, Kanagawa-Ken;

9. TAKAKURA Tadashi

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is 4-Chome, Kumamoto-Chō Hida, Ōita-Ken;

10. Major General KASHIWA Toku

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is Fukushima-shi, Fukushima-Ken;

11. Lieutenant General KAWABE Torashirō

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is Nagoyashi, Aichi-Ken;

12. Mr. H. G. W. WOODHEAD

- (a) The nationality of the witness is British;
- (b) The present address of the witness is unknown but he is understood to be connected with a newspaper published in Canton, Kwangtung Province, China;

13. Mr. Wilhelm WAGNER

- (a) The nationality of the witness is German;
- (b) The present address of the witness is unknown but he is reported to be in Japan and interned under the supervision of the occupation forces;

14. KAWAGOE Shigeru

- (a) The nationality of the witness is Japanese;
- (b) The present address of the witness is 804 Horinouchi, Hayama, Kanagawa-Ken;

15. NATHAN (given name unknown)

- (a) The nationality of the witness is British;
- (b) The present address of the witness is unknown; he was interned in Peiping during the war and reported since the end of the war to have resumed his connection with the Kailan Mining Administration in Tientsin;

The facts to be proved by these witnesses are the policies, utterances and actions of the defendant UMEZU during the period in which he is charged by the indictment herein;

The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment, and was not responsible for the planning, initiating or waging of wars of aggression;

The date upon which the attendance of the witnesses will be required for testifying cannot be stated accurately; but their attendance for consultation with counsel is required forthwith.

II. Documents

1. Principles of Plans of Operations of the Imperial Army (Teikoku Rikugun Sakusen Keikaku Yōkō), prepared in the autumns of the years 1940, 1941, 1942 and 1943 respectively, by the Japanese General Staff and forwarded to the headquarters of the Kwantung Army;
2. Principles for Preparation of Operations of the Kwantung Army (Kantōgun Sakusen Jumbi Yōkō), February 1942, prepared by the Japanese General Staff and forwarded to the headquarters of the Kwantung Army;
3. Operations Plan of the Kwantung Army (Kantōgun Sakusen Keikaku), prepared in the springs of the years 1940, 1941, 1942, 1943 and 1944 by the headquarters of the Kwantung Army;
4. Border Guard Regulations of the Kwantung Army (Kokkyō Keibi Yōkō), prepared in September or October 1939 by the headquarters of the Kwantung Army;
5. Kwantung Army Special Maneuvers (Kantōgun Tokubetsu

Enshū, commonly referred to as Kantokuen), prepared in the summer of 1941 by the Japanese General Staff and forwarded to the headquarters of the Kwantung Army.

All of these documents were kept in the secret files, especially the Secret Instructions File of the headquarters of the Kwantung Army, located in the operations room of the Kwantung Army headquarters building in Hsingking, Manchuria.

The relevance of these documents is that they will prove the character and scope of operations and other plans of the Japanese army, and notably of the Kwantung Army, vis-a-vis the USSR.

UMEZU Yoshihiro

By

MIYATA Mitsuo

Ben Bruce Blakeney

His Counsel

18 November 1946